

1 THE HONORABLE JAMES L. ROBART
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7 UNITED STATES DISTRICT COURT
8 FOR THE WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 JOHNNY B. DELASHAW, JR.,
11 Plaintiff,

12 v.
13 SEATTLE TIMES COMPANY, and
14 Defendants.

CASE NO. 2:18-cv-00537-JLR

DECLARATION OF JESSICA L.
GOLDMAN IN SUPPORT OF SEATTLE
TIMES' MOTION TO SEAL

NOTED: July 8, 2020

I, Jessica L. Goldman, hereby declare:

1. I am one of the attorneys of record for Defendant The Seattle Times Company
2 ("The Seattle Times") in this matter. I am over the age of 18 and make this declaration based on
3 personal knowledge.

4. In anticipation of filing The Seattle Times' Second Motion for Summary Judgment
5 (being filed today), on July 8, 2020, I have communicated with the lawyers for Plaintiff Dr.
6 Delashaw, Defendant Dr. Cobbs, nonparty Swedish Health Services, nonparty Dr. David Newell,
7 and nonparty Dr. Rod Oskouian regarding documents those parties and nonparties designated as
8 "Confidential." As a result of those communications, the designating parties and nonparties have
9 authorized The Seattle Times to file in open court some of the documents they previously
10 designated as "Confidential" or "Private" or "Attorneys Eyes Only" and the Times is doing so
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GOLDMAN DECL. ISO SEATTLE TIMES' MOTION TO
SEAL - 1
CASE NO. 2:18-cv-00537-JLR

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today. Those documents that the designating parties and nonparties would not agree could be filed in open court are being provisionally filed under seal by The Seattle Times to allow the designating parties to satisfy their burden of establishing the propriety of their designations.

I declare under penalty of perjury under the laws of the United States of America and the State of Washington that the foregoing is true and correct.

EXECUTED in Seattle, Washington this 8th day of July, 2020.

/s Jessica L. Goldman

Jessica L. Goldman, WSBA #21856

GOLDMAN DECL. ISO SEATTLE TIMES' MOTION TO
SEAL - 2
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